

THE HONORABLE RONALD B. LEIGHTON

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF WASHINGTON
AT TACOMA

UNITED STATES OF AMERICA,

Plaintiff,

vs.

TROY X. KELLEY,

Defendant.

Case No. 3:15-cr-05198-RBL

DEFENDANT'S MOTION TO SEAL
PLEADINGS REGARDING RELEASE
OF FUNDS

**NOTED FOR:
Friday, January 22, 2016**

Pursuant to Local Criminal Rule CrR 55(c), Troy Kelley submits this motion to file the following pleadings under seal: (1) Stipulation to Release Funds and Create a Security Interest in Favor of the United States; and (2) Order Releasing Funds and Creating a Security Interest in Favor of the United States. These pleadings are akin to those matters that are required to be filed under seal under Local Criminal Rule CrR 55(b)(4) (financial affidavits) because they relate and specifically refer to Mr. Kelley's personal assets and the amount of certain of those assets. The pleadings also specifically identify an account and account number of Mr. Kelley's. Finally, the pleadings pertain to the cost of Mr. Kelley's defense, a matter that should not in normal circumstances be public information or even filed with the Court but for the unusual circumstances of this case involving a blocked trust account held by counsel for the defendant.

1 The government does not oppose this motion to seal.

2 For these reasons, Mr. Kelley respectfully requests that the referenced pleading be
3 filed and remain under seal.

4 DATED this 22nd day of January, 2016.

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CERTIFICATE OF SERVICE

I hereby certify that on January 22, 2016, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the following:

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